

# Exhibit B

CAUSE NO. 17-09-10554

KELSEY VARGAS,  
*Plaintiff,*

v.

NATIONWIDE GENERAL INSURANCE  
COMPANY AND JOHN DOE  
*Defendants.*§  
§  
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§  
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§

IN THE COUNTY COURT

MONTGOMERY COUNTY, TEXAS

AT LAW NO. 2

**DEFENDANT NATIONWIDE GENERAL INSURANCE COMPANY'S  
ORIGINAL ANSWER**

Defendant Nationwide General Insurance Company ("Nationwide") files this Original Answer to Plaintiff's Original Petition, respectfully showing the Court as follows:

**I.  
GENERAL DENIAL**

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Nationwide enters a general denial of each and every material allegation contained in Plaintiff's Original Petition and any supplements or amendments thereto, and demands strict proof thereof.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully prays that Plaintiff takes nothing from Nationwide and that Nationwide recover its costs, fees, and expenses, and for such other further relief to which it may be entitled.

*(Signature on following page.)*

Respectfully submitted,

/s/ Patrick M. Kemp

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**ATTORNEYS FOR DEFENDANT  
NATIONWIDE GENERAL INSURANCE  
COMPANY**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing instrument has been served electronically via e-file this the 29th day of September, 2017 to:

Robert C. Lane

Jack Kitchen

The Lane Law Firm, PLLC

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/s/ Patrick M. Kemp

Patrick M. Kemp